

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

RICHARD ALEXANDER MURDAUGH, )  
JR., )  
Plaintiff, ) Civil Action No.: 9:24-cv-04914-RMG  
)  
v. ) JURY TRIAL DEMANDED  
)  
BLACKFIN, INC., WARNER BROS. )  
DISCOVERY, INC., WARNER MEDIA )  
ENTERTAINMENT PAGES, INC., )  
CAMPFIRE STUDIOS, INC., THE )  
CINEMART LLC, NETFLIX, INC., )  
GANNETT CO., INC. and MICHAEL M. )  
DEWITT, JR., )  
Defendants. )

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**PLAINTIFF'S MOTION TO REMAND**

PLEASE TAKE NOTICE that the Plaintiff, Richard Alexander Murdaugh, Jr., through his undersigned counsel, moves for an Order remanding this action to the Hampton County Court of Common Pleas and awarding attorneys' fees and costs pursuant to 28 U.S.C. § 1447. Defendants Netflix, Inc. and The Cinemart LLC (collectively "Defendants") removed this action from the Hampton County Court of Common Pleas based on an allegation that Defendant Michael M. DeWitt, Jr. is an improperly-joined party. However, the Defendants cannot meet their burden of establishing fraudulent joinder, and in fact they lack an objectively reasonable basis for the removal of Plaintiff's action to this Court. For these reasons and those detailed in his contemporaneously filed memorandum in support, Plaintiff's Motion to Remand to the Hampton County Court of Common Pleas and application for attorneys' fees and costs should be granted.

[SIGNATURE PAGE TO FOLLOW]

## KENT LAW FIRM, LLC

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